

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARM LTD., a U.K. corporation,

Plaintiff,

v.

QUALCOMM INC., a Delaware corporation,
QUALCOMM TECHNOLOGIES, INC., a
Delaware corporation, and NUVIA, INC., a
Delaware corporation

Defendants.

C.A. No. 22-1146-MN

[PROPOSED] VOIR DIRE

Good morning, ladies and gentlemen. My name is Maryellen Noreika, and I am the judge who will be presiding over the civil trial for which a jury is about to be selected, a case captioned Arm Ltd. v. Qualcomm, Inc. This case is an action for breach of contract [**Defendants propose:** and other related disputes].

For those of you selected to serve as jurors, I will give you more detailed instructions once you are sworn in as jurors and again at the conclusion of the trial. For now, I will simply tell you this is a lawsuit involving the licensing of technology used in computer processing chips. The Plaintiff is Arm, Ltd., and the Defendants are Qualcomm, Inc., Qualcomm Technologies, Inc., and Nuvia, Inc.

Arm entered into license agreements with Nuvia, a company later acquired by Qualcomm. After Qualcomm acquired Nuvia, Arm terminated its licensing agreements with Nuvia. Arm contends that Nuvia and Qualcomm have breached the Nuvia agreements by continuing to use technology and work product developed under the Nuvia licenses after Arm terminated the license agreements.

[**Defendants propose:** Qualcomm further argues that the relevant technology and work product developed under the Nuvia agreements is fully licensed under Qualcomm’s separate licenses with Arm.]

For those of you who end up being on the jury, I will give you more detailed instructions on the law later in the case.

The trial is expected to take up to five days, though it is possible that jury deliberations could extend your service beyond that. We will start each day at 9:00 a.m. and finish no later than 5:00 p.m. Our trial days will include a morning break of fifteen minutes, a lunch break of forty-five minutes, and an afternoon break of fifteen minutes.

I am going to ask you questions, the purpose of which is to select a fair and impartial jury. Before I ask any questions, I am going to ask the Deputy Clerk to swear the jury panel to answer any questions truthfully. (To Deputy, “Please swear the panel.”).

If any of you answer “yes” to any of the questions that I ask, please raise your hand, and when called upon, please stand and state your name and your juror number. When I have concluded asking all of the questions, I will move to my jury room, along with the attorneys and the court reporter. Then, for any of you who have answered “yes” to any of my questions, members of my staff will bring you individually to the jury room, so you can speak to me and the attorneys about any “yes” answers you had. Now I will ask the questions.

1. Does the schedule that I have just mentioned present a special problem to any of you?
2. Have any of you heard or read anything about this case?
3. Have you or has anyone in your immediate family or close friends had any dealings with, owned stock in, or been employed by Arm Ltd. or SoftBank, [**Defendants propose:** which is the parent company of Arm]?

4. Have you or has anyone in your immediate family or close friends had any dealings with, owned stock in, or been employed by Qualcomm Inc., Qualcomm Technologies, Inc., or Nuvia, Inc.?
5. Do you have any opinions about Arm Ltd., SoftBank, Qualcomm Inc., Qualcomm Technologies, Inc., or Nuvia, Inc. or experience with them or their products that might make it difficult for you to be a fair and impartial juror in this case?
6. To your knowledge, have you or has anyone in your immediate family or close friends bought any products containing Arm Ltd., Qualcomm Inc., Qualcomm Technologies, Inc., or Nuvia, Inc. technology [**Defendants propose:** —for example, a Lenovo Yoga Slim 7x, Dell XPS 13, HP EliteBook Ultra, or Samsung Galaxy Book4 Edge—]or is there anything about that experience that might make it difficult for you to be a fair and impartial juror in this case?
7. The law firms and lawyers involved in this case are listed here. Please carefully review the list:
 - Morrison Foerster LLP
 - Daralyn J. Durie
 - Scott F. Llewellyn
 - Nicholas Rylan Fung
 - Erik J. Olson
 - Sarah Brickey
 - Shaelyn Dawson
 - Michael DeStefano
 - Henry Huttinger
 - Meet Yatin Mehta
 - Zach Quinlan
 - Laura Gilbert

- Nate Tan
- Michael Jacobs
- Daniel Muino
- Jack Li
- Young Conaway Stargatt & Taylor, LLP
 - Anne Shea Gaza
 - Robert M. Vrana
 - Daniel Mackrides
- Morris, Nichols, Arsht & Tunnell LLP
 - Jack B. Blumenfeld
 - Jennifer Ying
- Norton Rose Fulbright Us LLP
 - Richard Zembek
 - Darren Smith
 - John Poulos
- Paul, Weiss, Rifkind, Wharton & Garrison LLP
 - Karen L. Dunn
 - William A. Isaacson
 - Melissa F. Zappala
 - Catherine Nyarady
 - Erin J. Morgan
 - S. Conrad Scott
 - William T. Marks
 - Ruby J. Garrett
 - Jacob A. Braly
 - Kimberly Grambo
 - Jacob Apkon
 - Flint A. Patterson
 - Candice J. Yandam Riviere
 - Anna P. Lipin

Do any of you or the members of your immediate families, such as a spouse, child, parent, or sibling, or any of your close friends know of or have any business dealings with, or been employed by, any of the attorneys or law firms?

8. The potential witnesses in this case are listed here. Please carefully review the list:

- Will Abbey
- Vivek Agrawal
- Jonathan Armstrong
- Lynn Couillard
- Jeff Defilippi
- Richard Grisenthwaite
- Rene Haas
- Tim Herbert
- Simon Segars
- Karthik Shivashankar
- Christine Tran
- Mark Werkheiser
- Paul Williamson
- Cristiano Amon
- Ziad Asghar
- Geeta Balakrishnan
- Lynn Bos
- Ramakrishna Chunduru
- Manu Gulati
- Pradeep Kanapathipillai
- Laura Sand
- Nitin Sharma
- Rohit Singh
- James Thompson
- Jignesh Trivedi

- Geetha Vedaraman
- Gerard Williams
- Dr. Shuo-Wei (Mike) Chen
- Robert P. Colwell
- Dr. Murali Annavaram
- Nick Jones
- Jonathan Weiser
- Guy Larri
- Masayoshi Son
- Ian Thornton

Do any of you or the members of your immediate families, such as a spouse, child, parent, or sibling, or any of your close friends know of or have any business dealings with, or been employed by, any of these individuals?

9. Do you have personal experience negotiating contracts?
10. Have you or any member of your immediate family, any of your close friends, or your employer ever been involved in a dispute about a contract?
11. **[Defendants propose:** Do you have any strong opinions about contracts or contract disputes?]
12. **[Defendants propose:** Have you or someone close to you ever been harmed in a business deal or financial transaction?]
13. **[Plaintiff proposes:** Do you feel the government should be doing more to promote competition in the marketplace?]
14. Have you ever worked for a company that supplied products to another company?
15. Have you ever provided technology or technical support to another company?

16. Have you ever worked for a company that acquired or was acquired by another company?
17. Have you or any member of your immediate family ever worked as a computer or electrical engineer or a computer programmer?
18. Have you or any member of your immediate family ever worked in the semiconductor industry?
19. Do you have any opinions about the semiconductor industry?
20. Do you have any formal education or training or have you worked in any of the following fields: law, computer programming, or computer or electrical engineering?
21. Do you have any strong opinions about lawsuits or the people or companies who file them?
22. Have you ever been a plaintiff, a defendant, or a witness in a lawsuit?
23. Have you served as a juror?
24. If you are selected to sit as a juror in this case, are you aware of any reason why you would be unable to render a verdict based solely on the evidence presented at trial?
25. If you are selected to sit as a juror in this case, are you aware of any reason why you would not be able to follow the law as I give it to you?
26. Look around at the other potential jury members. Do you know any of the others, or have you had any relationship with any of the other jurors before today?
27. Is there anything, such as poor vision, difficulty hearing, or difficulty understanding spoken or written English, that would make it difficult for you to serve on this jury?
28. Is there anyone here who has very limited knowledge or personal experience with technology such as computers and mobile devices?

29. Have you ever had any experience with the legal system that would prevent you from being a fair and impartial juror?
30. Is there anything else, including something you have remembered in connection with one of the earlier questions, that you think you would like to tell me in connection with your service as a juror in this case?